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[REDACTED]

With reference to the above-mentioned case, and pursuant to our continuing obligations, the People make the following disclosure: during a recent trial preparation, Officer Jason Greenberg indicated that during the time he has been employed by the New York City Police Department, he may have been named as a defendant or co-defendant in a federal civil lawsuit. However, Off. Greenberg had no substantive knowledge about either the status of the lawsuit, or the specific allegations contained in the complaint. During the discussion, Off. Greenberg indicated that he may have been deposed in a such civil lawsuit, but had not given trial testimony in any civil lawsuits.

As a result of the conversation with Off. Greenberg, on December 15, 2015, the People performed a simple name search of the Public Access to Court Electronic Records ["PACER"] website, and found the following cases which list "Jason Greenberg" and "City of New York" as civil defendants in the Eastern and Southern Districts of New York:

1. *Donald v. City of New York*, 10CV4052(ARR) - settled in 2012 for \$9,000, with stipulation of settlement filed ending litigation in the Eastern District of New York;
2. *Ortega v. City of New York*, 15CV6646(FB) - presently pending litigation in the Eastern District of New York;